

Daniel T. Quinn
Alaska Bar No. 8211141
RICHMOND & QUINN
360 K Street, Suite 200
Anchorage, AK 99501
Phone: (907) 276-5727
Fax: (907) 276-2953
dquinn@richmondquinn.com

Attorneys for Defendant
Safeco Insurance Co. of America

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SUTTON STORAGE, LLC,)
Plaintiff,) Case No. 3:14-cv-_____
v.)
SAFECO INSURANCE CO. OF) **DEFENDANT'S NOTICE OF
AMERICA,) REMOVAL**
Defendant.)
)

TO: Clerk of the United States District Court
For The District of Alaska

AND TO: Michaela Kelley Canterbury

COMES NOW defendant, Safeco Insurance Co. of America and hereby gives notice that pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, it has this day filed in the United States District Court for the District of Alaska this Notice of Removal of the

following action: Sutton Storage, LLC v. Safeco Insurance Co. of America, which was filed in the Superior Court for the State of Alaska, Third Judicial District at Anchorage, Case No. 3AN-14-05791 Civil. You are also notified that defendant has filed a copy of this Notice of Removal with the Clerk of the Superior Court for the Third Judicial District at Anchorage, Case No. 3AN-14-05791 Civil, and that this action is thereby removed from the Superior Court to the United States District Court. (See Exhibit A hereto, "Notice of Removal".)

This Notice of Removal is being filed within thirty days after initial receipt of the complaint and is, therefore, timely filed under 28 U.S.C. § 1446(b). Service was effected on the corporate agent for service of process for defendant on April 22, 2014. Pursuant to 28 U.S.C. 1446(b), the notice of removal "shall be filed within thirty days after the receipt of the defendant, through service or otherwise, of a copy of an amended pleading, motion, order or other paper from which it may first be ascertained that the case is one which is or has become removable." A copy of plaintiff's Summons and Complaint are attached as Exhibit B.

Plaintiff is a corporation of the State of Alaska.

Defendant Safeco Insurance Co. of America is a New Hampshire Corporation, with its principal place of business in Boston, Massachusetts. The amount in controversy exceeds \$75,000.00.

Defendant's Notice of Removal

Sutton Storage, LLC v. Safeco Insurance Co. of America, Case No. 3:14-cv-_____

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Based on diversity of citizenship, this Court has removal jurisdiction over this action, and defendant is entitled to remove this action to this Court from the Superior Court for the State of Alaska.

DATED this 6th day of May, 2014, at Anchorage, Alaska.

RICHMOND & QUINN

By /s/ Daniel T. Quinn
Daniel T. Quinn
Alaska Bar No. 8211141
360 K Street, Suite 200
Anchorage, AK 99501
Ph: (907) 276-5727
Fax: (907) 276-2953
dquinn@richmondquinn.com

Attorneys for Defendant
Safeco Insurance Co. of America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of May, 2014, a copy of the foregoing was served by mail on the following:

Michaela Kelley Canterbury
821 N Street, Suite 205
Anchorage, AK 99501

/s/ Daniel T. Quinn
RICHMOND & QUINN

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Defendant's Notice of Removal
Sutton Storage, LLC v. Safeco Insurance Co. of America, Case No. 3:14-cv- _____
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